Sub-Part "A" Travel Analysis (TAP) Southern Region Expectations Revised to align with 2012 Chief's Letter

A. Background. During the period 2005 - 2010 the National Forests of the Southern Region successfully completed Sub-Part "B" (Designation of Roads, Trails and Areas for Motor Vehicle Use) Travel Analysis. The result was a set of Motor Vehicle Use Maps (MVUMs) which prescribe the Forest Service roads that allow traffic; and in doing so it also prohibited cross-country travel by off-highway vehicles (OHVs). Forests are now beginning work on Sub-Part "A" (Administration of the Forest Transportation System) Travel Analysis to identify the minimum road system needed for safe and efficient travel and for the protection, management and use of NFS lands; and also to identify roads no longer needed to meet forest resource management objectives.

TAP analysis identifies risks and benefits of individual roads in the system, but especially **cumulative effects and affordability of the entire system**. Consideration is given to the access needed to support existing Forest Plans, and for informing future Forest Plans and resulting projects. TAP is intended to identify opportunities to assist managers in addressing the unique ecological, economic and social conditions on the national forests and grasslands.

B. Agency Direction. Sub-Part "A" Travel Analysis is required by the 2005 Travel Management Rule (36 CFR 212.5). Forest Service Manual 7712 and Forest Service Handbook 7709.55 Chapter 20 provides specific direction, including the requirement to use a six step interdisciplinary, science-based process to ensure that future decisions are based on an adequate consideration of environmental, social and economic impacts of roads. A letter from the Chief of the Forest Service dated March 29, 2012 was issued to replace a November 10, 2010 letter previously issued on the same topic. It reaffirms agency commitment to completing travel analysis reports for Subpart A of the travel management rule by 2015, and also provides additional national direction related to this work, addressing process, timing and leadership expectations. The letter requires documentation of the analysis by a travel analysis report, which includes a map displaying the existing road system and possible unneeded roads. It is intended to inform future proposed actions related to

identifying the minimum road system. The TAP process is designed to work in conjunction with other frameworks and processes, the results of which collectively inform and frame future decisions executed under NEPA. These other analyses and procedures include Watershed Analysis Framework and mapping; Recreational Framework planning and analyses; and forest-wide planning under the new Planning Rule. This document (**Southern Region Expectations**) supplements the national direction for Sub-Part "A" TAPs developed for the Southern Region.

- C. Geographic Scale. Like smaller scale road analyses (RAPS) that have been underway at the project level, TAPs consider economic, environmental and social effects of roads. Analysis at the smaller project scale, however, does not adequately address cumulative effects and affordability. The Chief's letter requires that proposed NEPA actions be informed by work at the 6th order HUC watershed as a minimum. Southern Region Expectations are for a Unit TAP at the District level or equivalent; and since budgets are generally allocated to the Forest level, District analyses are not considered complete until all other Districts on the same Forest are also complete and have been integrated to create a Forest Scale TAP. As projects which involve travel (road) decisions are subsequently proposed on a unit, additional project level analysis will be required in advance of associated NEPA decisions only if the proposal varies substantially from the Unit Scale TAP covered by it. The purpose would be to show any additional impact on cumulative effects and affordability.
- D. Process, Review and Approval. Forests Interdisciplinary Teams (IDTs) are expected to conduct analyses, with guidance and review by the Regional Office TAP Review Team (members listed below). Standard boilerplate, spreadsheets and Executive Summary format will be developed by the Review team for incorporation into the TAP reports. Final review will be by the Forest Supervisor, indicating that the analyses comply with national and regional direction. Upon completion of the last District TAP on a Forest, the Forest Supervisor needs to submit a forest-wide Executive Summary and verify that the cumulative results meet the expectations defined in this guidance.

The Regional TAP Review Team consists of Team Leader Paul Morgan (Engineering), Emanuel Hudson (Biological and Physical Resources), Mary Hughes Frye (Recreation), Paul Arndt (Planning) and various other ad hoc members as needed. They will submit their review comments to the TAP Steering Team prior to officially conveying them to the Forest. The Steering Team will be responsible for overall direction and oversight of the process. This team consists of Randy Warbington, TAP

Steering Team Lead and Director of Engineering, Dave Schmid, Director of Biological and Physical Resources, Chris Liggett, Director of Planning, and Ann Christensen, Director of Recreation as well as George Bain, Forest Supervisor on the Chattahoochee Oconee NF's and Steve Bekkerus, Regional Legislative Affairs Specialist.

- E. **Information Systems.** Analysis will be based upon field-verified spatial data (GIS, or Geographic Information System road and trail layers), and official tabular data (from I-Web, the corporate Forest Service data base) as applicable. ARC Map products will be included as a part of all completed Unit Scale TAPs, and will be provided to the Regional Office TAP review team as a part of the final TAP report.
- F. Access. As prescribed by 16USC532 the Forest Roads and Trails Act TAPs should identify an adequate system of roads and trails to provide for intensive use, protection, development, and management of National Forest System lands. As such, they should address user safety and environmental impacts, and provide for an optimum balance of access needs and cost. Roads, trails and bridges that are unsafe and where unacceptable risks cannot be eliminated or mitigated due to a lack of funding should be identified for closure or possible decommissioning. Unneeded, temporary and unauthorized routes should be identified for possible decommissioning. TAPs should support current Forest Plan direction and anticipate future Forest Plan analysis needs, as well as Recreational Framework planning and analyses. As unit scale TAPs are completed, associated MVUMs must be reviewed. After appropriate NEPA decisions are made to implement TAP recommendations, future MVUM revisions need to be revised to assure that they are in agreement with those decisions.
- G. **Environmental.** One major analysis component of the TAPs is impact of the road system on water quality. In those cases where high road densities on National Forest lands are a major factor in causing watersheds to be at risk or impaired, some roads should be identified for decommissioning in order to reduce the impacts and change the classification. Also, it should be recognized that some existing roads are poorly located and should be eliminated, while some new roads might be needed to replace them and provide essentially equivalent access in better locations, generally farther away from live streams or wetlands. The Watershed Condition Framework should inform each unit's travel analysis. An overriding objective for all roads should be compliance with provisions cited in National Best Management Practices for Water Quality Management on National Forest System Lands, April 2012.

While a reduction in maintenance levels may be a desired option for cost reduction, it is not an appropriate strategy when it results in more environmental impacts. Similarly, changes in recreational use should be considered, especially for roads that cannot be maintained to standard and which may begin to attract challenge-oriented four-wheelers that create even further impacts on the environment and on the road.

H. Financial. Units should consider all expected sources of funding available to maintain the road system to appropriate standards (based upon 3 year history and current trends), and include all costs that are required to comply with applicable Best Management Practices (BMPs) for their maintenance. Include associated bridge maintenance as well, and replacement costs for those routes which include bridges that are deficient or expected to need major work in the next ten year period. Identify and account for fixed costs (program management, fleet, etc.) when analyzing financial feasibility. Ultimately units must balance the costs of maintaining the identified system such that the recommendation will not result in accrual of deferred maintenance on roads and bridges once the TAP is implemented (i.e. there should be a zero balance between anticipated maintenance revenue and anticipated maintenance cost on an annual basis).

The focus of this analysis should not be primarily on disinvestment, i.e. just reducing passenger car roads to high clearance roads in order to meet funding constraints. Roads receiving minimal maintenance have the high likelihood, at least those roads located relatively low in the watershed, of creating additional siltation impacts. They can also have unintended consequences for recreation management. Therefore a better strategy might be to identify roads not required for current operations but which might be needed at some time in the future for seasonal or intermittent closure, or "storage". Other strategies might include scheduling maintenance over a two to three year cycle on less used roads, adding seasonal restrictions, identifying roads to transfer to state or local jurisdiction, and identifying unneeded roads for possible decommissioning. Total mileage of high clearance roads should not generally increase over the amount in the current system unless it is determined that there has been substantial maintenance level "creep" over the years and therefore a substantial increase in high clearance roads is warranted. However it is expected that the number of roads identified to be placed in storage will generally increase from the current level.

Finally it should be noted that similar to the road system, the trail system is also over-committed to be managed within its maintenance budget. Therefore, unless maintenance funding is verified to be available over the long-term, it is not acceptable to identify roads for conversion to trails; the more appropriate options would be storage or decommissioning, depending upon future need.

- I. Public Involvement and NEPA (National Environmental Protection Act) Requirements. Unit scale TAPs are not NEPA decisions; they are analyses intended to inform future projects regarding affordability and cumulative effects. These projects, depending upon the specific impacts, will generally require NEPA decisions prior to implementation. The public will need to be provided opportunities for comment on TAP recommendations near to the time that that actual projects are being proposed. This would be expected to include a broad spectrum of participation by citizens, other agencies, and tribal governments as appropriate.
- **J. Products.** All final products to be posted on an internal website or on the "O" drive available for access by other Forests and the Regional Office. The final product should consist of the following items:
 - 1) A **Travel Analysis Report** summarizing the process the results of all analyses conducted.
 - 2) A map showing the entire Road System, ML 1-5, and delineating potential unneeded roads.
 - 3) A list of roads that are proposed for transfer to another jurisdiction and whether acceptance by that jurisdiction is likely within the next three years.
 - 4) A tabular **summary of issues, benefits and risks** for each road in the system. (Although not included in this write-up an example format is available and will be provided to each unit as they begin work on their TAP.)
 - 5) A spreadsheet identifying available maintenance funding and expected costs for applying affordable operational maintenance levels and associated BMPs (best management practices) to the road system to result in a financial strategy that balances funding and costs such that no deferred maintenance will accrue if fully implemented.
 - 6) Signature sheets with dates, indicating preparation and review officials, and Review by the Forest Supervisor.
- K. Schedule and Completion Date.

The chief's letter directs that all units be covered by a TAP by the end of FY 2015. The proposed schedule is as follows:

FY10 George Washington NF, GW/J NFs
Talladega Ranger District, NFs in Alabama
Andrew Pickens RD, FM/S NF
Davy Crockett Ranger District, NFs in Texas

FY11 Jefferson NF, GW/J NFs - Completes GW/J NFs
Oakmulgee Ranger District, NFs in Alabama
Oconee Ranger District, Chattahoochee-Oconee NFs
Appalach/Wakulla Ranger District, NFs in Florida
Enoree Ranger District, FM/S NF
Croatan NF, NFs in North Carolina

FY12 Shoal Creek Ranger District, NFs in Alabama

Bankhead RD, NFs in Alabama

Conecuh RD, NFs in Alabama

Tuskegee RD, NFs in Alabama

Conosauga Ranger District, Chattahoochee Oconee NFs

Chattooga River RD, Chattahoochee-Oconee NFs

Blue Ridge RD, Chattahoochee-Oconee NFs - Completes CH-O NFs

Osceola RD, NFs in Florida

Long Cane RD, FM/S NFs

Winn RD, Kisatchie NF

Pisgah NF in NC

Angelina/Sabine Ranger District, NFs in Texas

Sam Houston RD, NFs in Texas

Redbird RD, Daniel Boone NF

Magazine RD, Ozark-St. Francis NFs

FY13 Stearns RD, Daniel Boone NF

Shoal Creek RD, NFs in Alabama - Completes NFs in AL

Caney and Kisatchie RDs, Kisatchie NF

LBJ/Caddo RD, NFs in TX - Completes NFs in TX

Nantahala NF in NC

Ocala RD, NFs in Florida – **Completes NFs in FL**Francis Marion RD, FM/S NFs – **Completes FM/S NFs**Big Piney, Pleasant Hill and Boston Mountain RDs, Ozark-St. Francis NFs
Land between the Lakes – **Completes LBL RA**

FY14 NFs in Mississippi – Completes NFs in MS

London RD, Daniel Boone NF Ouachita NF (Districts to be named)

Sylamore and St. Francis RDs, Oz-St. Francis NFs
Lee Creek, Lake Weddington RDs, Ozark St. Francis NFs – Completes Oz-St.
Francis NFs

Calcasieu and Catahoula RDs, Kisatchie NF – **Completes Kisatchie NF** Uwharrie RD, NFs in NC – **Completes NFs in NC**

FY15 El Yunque NF – Completes EYNF

Cumberland RD, Daniel Boone NF – Completes DBNF
Cherokee NF – Completes Cherokee NF
Ouachita NF (Remaining Districts) – Completes Ouachita NF

The End